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FILED IN THE U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

JUL 24 2024

SEAN F. McAVOY, CLERK
SPOKANE, WASHINGTON

9 UNITED STATES DISTRICT COURT
10 FOR THE EASTERN DISTRICT OF WASHINGTON

11 UNITED STATES OF AMERICA,

Case No.: 2:24-CR-97-TOR

12 Plaintiff,

INDICTMENT

13 v.

Vios: 18 U.S.C. §§ 2241(c), 1153
Aggravated Sexual Abuse of a
Minor in Indian Country
(Counts 1, 2)

14 LAVERN JOSEPH ADOLPH,

15 Defendant.

16 18 U.S.C. § 2253
17 Forfeiture Allegation

18 The Grand Jury charges:
19

20 COUNT 1

21 Between on or about a date unknown but by January 2017, and continuing
22 through to on or about November 9, 2020, in the Eastern District of Washington,
23 within the external boundaries of the Confederated Tribes of the Colville
24 Reservation, in Indian Country, the Defendant, LAVERN JOSEPH ADOLPH, an
25 Indian, did knowingly engage in a sexual act with MINOR 1, a person who had not
26 attained the age of 12 years, all in violation of 18 U.S.C. §§ 2241(c), 1153.
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COUNT 2

Between on or about a date unknown but by January 2017, and continuing through to on or about November 9, 2020, in the Eastern District of Washington, within the external boundaries of the Confederated Tribes of the Colville Reservation, in Indian Country, the Defendant, LAVERN JOSEPH ADOLPH, an Indian, did knowingly engage in a sexual act with MINOR 2, a person who had not attained the age of 12 years, all in violation of 18 U.S.C. §§ 2241(c), 1153.

NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS

The allegations set forth in this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures.

Pursuant to 18 U.S.C. § 2253(a)(2) and (a)(3), upon convicted of an offense in violation of 18 U.S.C. § 2244 or 2241 as set forth in Count 1 and Count 2 of this Indictment, the Defendant, LAVERN JOSEPH ADOLPH, shall forfeit to the United States any visual depiction described in section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of this chapter, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of this chapter; any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offenses; and any property, real or personal, used or intended

1 to be used to commit or to promote the commission of such offenses, or any
2 property traceable to such property.
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4 If any of the property described above, as a result of any act or omission of
5 the Defendant:
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- 7 a. cannot be located upon the exercise of due diligence;
8 b. has been transferred or sold to, or deposited with, a third party;
9 c. has been placed beyond the jurisdiction of the court;
10 d. has been substantially diminished in value; or
11 e. has been commingled with other property which cannot be divided
12 without difficulty,

13 the United States of America shall be entitled to forfeiture of substitute property
14 pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 2253(b).

15 DATED this 24 day of July 2024.
16

17 A TRUE BILL
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19

20 Vanessa Waldref

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